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Shueisha Inc.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In Re 17 U.S.C. § 512(h) Subpoena to  
CLOUDFLARE, INC.

Case No.:

**DECLARATION OF HIROYUKI  
NAKAJIMA IN SUPPORT OF SUBPOENA  
TO OBTAIN THE IDENTITY OF A  
CLOUDFLARE, INC. CUSTOMER  
PURSUANT TO 17 U.S.C. § 512(h)**

I, Hiroyuki Nakajima, declare as follows:

1. I am an attorney with the law firm Tokyo Flex Law Office, copyright counsel for Shueisha Inc. (“Shueisha”). I make this declaration in support of Shueisha’s request for the clerk of the District Court for the Northern District of California to issue the subpoena filed concurrently herewith pursuant to the Digital Millennium Copyright Act (DMCA), 17 U.S.C. § 512(h). I have personal knowledge of the facts stated in this Declaration and if called to do so, would testify competently thereto.

2. I am duly authorized by Shueisha to make this request on Shueisha’s behalf.

3. Shueisha is a leading entertainment publishing company headquartered in Japan.

Among other things, the company specializes in the publication and distribution of Japanese comics

known as “mangas,” in both tangible and digital media. Numerous titles published by Shueisha have achieved a high degree of popularity worldwide, including in the United States.

4. Shueisha recently discovered that some of its mangas, to which Shueisha is the authorized holder of the copyrights, have been in whole or in part copied, published, displayed, and/or distributed without its authorization on websites run by certain users of services provided by Cloudflare, Inc. (“Cloudflare”). URLs containing the infringing content are identified in the DMCA notice Shueisha sent to Cloudflare, Inc. on January 6, 2025, a true and correct copy of which is attached hereto as **Schedule 1** (the “DMCA Notice”).

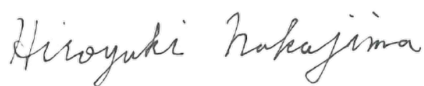
5. Upon information and belief, Cloudflare provides content delivery services enabling the unauthorized reproduction and distribution of copyrighted works to which Shueisha holds exclusive rights, using the URLs (associated with specific user accounts) identified in the DMCA Notice.

6. On information and belief, Cloudflare’s policies require a subpoena or court order to compel the company to disclose information about a Cloudflare user or account used in furtherance of the infringement of another’s copyrights.

7. The sole purpose for which the requested subpoena is sought is to obtain the identities of the alleged infringer(s) described in the DMCA Notice and such information will only be used for the purpose of protecting Shueisha’s copyright rights.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on January 22, 2025 in Tokyo, Japan.

By:   
Hiroyuki Nakajima